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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

AFTER SERVICES, INC., a Delaware  
corporation,

Plaintiff,

vs.

FOUNDATION PARTNERS GROUP, LLC, a  
Florida limited liability company, and DOES I-  
X, inclusive,

Defendants.

Case No. 2:24-cv-01207-JCM-BNW

**STIPULATION AND  
ORDER VOLUNTARILY  
DISMISSING COUNTS 1, 3, 5, 7, 8, 9,  
AND 10 OF THE COMPLAINT AND  
ALL DOE DEFENDANTS,  
WITHOUT PREJUDICE, AND  
WITHOUT AN AWARD OF  
ATTORNEYS' FEES OR COSTS TO  
ANY PARTY, AND AMENDING  
CASE CAPTION**

Pursuant to Rule 41(a)(1)(A)(i) and (ii) of the Federal Rules of Civil Procedure, and the Court's Scheduling Order (ECF No. 31), Plaintiff After Services, Inc. ("Plaintiff") and Defendant Foundation Partners Group, LLC ("Defendant"), hereby agree and stipulate to the entry of an Order voluntarily dismissing the following Counts of the Complaint (ECF No. 1), without prejudice, and without an award of attorneys' fees or costs made to any party:

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- Count 1 (violation of Lanham Act 15 U.S.C. §§ 1051 et seq.),<sup>1</sup>
- Count 3 (Trademark Dilution Pursuant to 15 U.S.C. § 1125(c)),
- Count 5 (Intentional Interference with Prospective Economic Advantage),
- Count 7 (Deceptive Trade Pursuant to NRS Chapter 598),
- Count 8 (Cybersquatting Pursuant to 15 U.S.C. §1125(d)),
- Count 9 (Trademark Registration Cancellation Pursuant to 15 U.S.C. § 1064),
- and
- Count 10 (Declaratory Relief Pursuant to 28 U.S.C § 2201)).

The Partis stipulate to this voluntary dismissal in accordance with the Court’s Scheduling Order (ECF No. 31), and for the purpose of narrowing the issues to be tried and to forgo the filing of motions to dismiss and/or for summary judgment on the remaining Counts of the Complaint, each of which shall proceed expeditiously to trial on the merits, *i.e.* Count 2 (Trademark Infringement Pursuant to 15 U.S.C. § 1114); Count 4 (Common Law Trademark Infringement); and Count 6 (Unfair Competition Pursuant to 15 U.S.C. § 1125(a)).

The parties hereby further agree and stipulate to voluntarily dismiss all “DOE” defendants including, without limitation, DOES I-X inclusive, without prejudice, and without an award of attorneys’ fees or costs made to any party, and to amend the case caption to reflect the dismissal of such defendants.

There is good cause, therefore, for the requested voluntary dismissals.

**IT IS SO AGREED AND STIPULATED:**

HOWARD & HOWARD ATTORNEYS PLLC

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<sup>1</sup> This Count shall be dismissed only to the extent it is duplicative of Counts 2, 3, 6, and/or 8.

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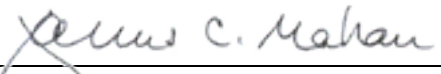
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*Attorneys for Plaintiff*  
*After Services, Inc.*

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13 **IT IS SO ORDERED:**

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16 UNITED STATES DISTRICT JUDGE

17 DATED: October 7, 2024  
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